

UNITED STATES DISTRICT COURT
for the
Southern District of Texas

United States Courts
Southern District of Texas
FILED

October 12, 2023

Nathan Ochsner, Clerk of Court

United States of America

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v.

)

Michael Chase WATSON

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Case No.

3:23-MJ-0120

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Jan. 28, 2023 and Oct. 12, 2023 in the county of Brazoria in the
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC § 2252A (a)(2)(A)	Receipt of Child Pornography
18 USC § 1519	Destruction of Evidence in a Federal Investigation

This criminal complaint is based on these facts:

See attached document titled, "AFFIDAVIT"

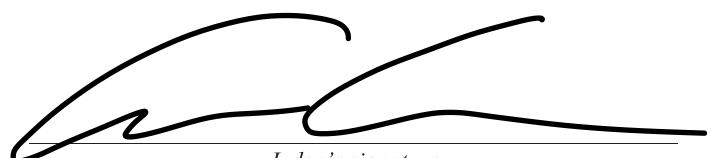
Continued on the attached sheet.

Michael A. Monahan

Complainant's signature

Michael A. Monahan, HSI Special Agent

Printed name and title



Judge's signature

Andrew M. Edison, United States Magistrate Judge

Printed name and title

Submitted by reliable electronic means, sworn
to,
signature, attested telephonically per
Fed.R.Crim.P.4.1, and probable cause found on:

Date: 10/12/2023

City and state: Bear, OR
Galveston, Texas

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

IN THE MATTER OF: §
Michael Chase Watson § Case No.3:23-MJ-0120

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (HSI), currently assigned to the Resident Agent in Charge office in Galveston, Texas. I have been employed in this agency since July of 2009, and my responsibilities include investigating criminal violations related to offenses committed against the United States including but not limited to, child exploitation and child pornography, including violations pertaining to the illegal production, distribution, receipt, and possession of child pornography in violation of Title 18, United States Code, § 2252A. I have also received training in the area of child exploitation and child pornography with regard to violations of Title 18 United States Codes Sections 2251, 2252, 2252A, and related offenses.

I am familiar with the information contained in this affidavit based upon the investigation I have conducted and based on my conversations with other law enforcement officers involved in this investigation, or who have engaged in numerous investigations involving child sexual exploitation.

The facts in this affidavit come from my personal observations, my training and experience and information obtained from other officers, agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the criminal charges being described below in this matter. Based on my training, experience, and the facts set forth in this affidavit, there is probable cause to believe that violations of 18 United States Code 2252A

(a)(2)(A) (Receipt of Child Pornography) and 18 United States Code 1519 (Destruction of Records in Federal Investigations) have been committed by Michael Chase WATSON.

PROBABLE CAUSE

St. George Police Department (Utah) Detectives routinely partner with state and local policing agencies to identify and investigate individuals seeking to sexually exploit minors. During February 2023, HSI St. George partner agency, St. George Police Department (SGPD) initiated an investigation of a social-media user seeking to distribute child pornography for profit. As part of their duties, specifically assigned SGPD Detectives routinely operate in online undercover capacities where they seek to identify individuals engaging in activities relating to the sexual exploitation of minors. Working in this capacity during early 2023, the detectives independently observed a Whisper user (Whisper is an application operated by MediaLab.ai Inc.) seeking to distribute child pornography for profit. As part of this user's posts, the user posted a Kik (also operated by MediaLab.ai Inc.) under a particular username.

On March 3, 2023, a St. George Police Department Detective was operating in an online undercover capacity. In that capacity, the detective observed that a Whisper/Kik user was presenting themselves as offering child sexual abuse material (CSAM) for monetary compensation. The subject's Whisper post directed interested parties to contact the subject via the Kik messaging application under a specific screenname (hereafter referred to as USER 1) for "F12-17." The detective recognized this post from his experience in online undercover chatting operations as an advertisement for CSAM. The detective messaged USER 1 on the Kik application asking, "Saw you on W, what do you have?". USER 1 replied, "F12-17 year old girls Sex pics and vids." Following some more conversation, USER 1 sent four sample child pornography videos to the detective via Kik. It was learned by investigators through a later

search warrant execution on the target Kik account (USER 1) that the Kik user had distributed CSAM to over 200 other Kik users around the world. HSI St. George Special Agents caused to be served DHS summonses upon several Internet Service Providers (ISP) in effort to determine the locations of the receiving Kik users based upon Internet Protocol (IP) addresses associated with their Kik Messenger accounts.

The IP address 24.72.179.176, which is associated with the account of Kik user **1a2b77840**, resolved to a Cable One, Inc. Internet subscriber by the name of Wayne WILSON at 122 Oyster Creek Drive, Angleton, Texas 77515-9471 on March 3, 2023 and during the same time frame as the aforementioned undercover operation which led to the receipt of four sample CSAM files by the detective. One of the CSAM files matches the description of a CSAM video file sent by Kik user USER 1 to Kik user **1a2b77840** on January 28, 2023. According to records received by HSI St. George Special Agents from MediaLab.AI, Inc., the IP address 24.72.179.176 was also used to connect to the Kik Messenger account identified by username **1a2b77840** on several dates between February 2, 2023 through March 1, 2023.

On July 24, 2023, HSI Galveston received an investigative referral and initiated an investigation into the Angleton, Texas residence and its owner and occupants. I have reviewed the pertinent CSAM content and discovery sent to HSI Galveston by HSI St. George. I have conducted research in law enforcement and open source Internet databases.

My initial investigation of this matter revealed that the IP address 24.72.179.176 was also utilized to access a cloud storage account from 01/15/2023 through 01/31/2023. It is commonly known to child exploitation investigators that many collectors of child pornography use the particular cloud storage service (hereafter CLOUD SERVICE PROVIDER) to store CP files as well as to share CP files with other collectors around the world. Moreover, the original target of

this investigation, Kik user USER 1, utilized the same platform to share over a thousand CSAM files with an undercover investigator after arranging the transfer/purchase of the CP files via the Kik messaging application in March/April 2023. CLOUD SERVICE PROVIDER reported that the email address associated with the account accessed by the IP address 24.72.179.176 (associated with Kik user **1a2b77840**) is **michaelwat4555@yahoo.com**. Through investigative research and law enforcement database checks, I determined that the residence of record of Defendant **Michael Chase WATSON** (age 36), hereinafter **WATSON**, is 122 Oyster Creek Drive, Angleton, Texas 77515.

According to the Kik search warrant production from the USER 1 Kik account furnished by HSI St. George, Kik user USER 1 sent a video file titled 4e706d43-e383-45a0-ae3f-e11f1454ba06 to Kik user **1a2b77840** on 01-28-2023 at 19:16:48 Coordinated Universal Time (UTC) (1:16:48 PM Central Standard Time (CST)). According to the SGPD detective's report documenting his UC operation on March 3, 2023, during which he received four sample CSAM video files from USER 1 prior to coordinating to a later UC purchase of CSAM files via the CLOUD SERVICE PROVIDER, he documented one of the sample videos as depicting the following:

Video #4:

A female, approximately 5 to 10 years old, appears to be kneeling in a shower, not wearing a shirt and a nude male in front of her. The male has an erect penis, and she puts the penis in her mouth while rubbing the penis with her hand.

My review of video file 4e706d43-e383-45a0-ae3f-e11f1454ba06 shows that video file matches the above description. The SGPD detective has confirmed that the video file titled 4e706d43-e383-45a0-ae3f-e11f1454ba06 is, in fact, the same as "Video #4" received by him from USER 1 during his undercover chat with USER 1 on March 3, 2023.

On August 17, 2023, I caused to be served a DHS summons upon Cable One, Inc. requesting the subscriber information for IP address 24.72.179.176 for the time period of 01/28/2023 00:11:21 UTC through 01/29/2023 19:13:19 UTC. The responsive data received from Cable One, Inc. revealed that IP address 24.72.179.176 also resolved to a Cable One, Inc. Internet subscriber by the name of Wayne WILSON at 122 Oyster Creek Drive, Angleton, Texas 77515-9471 during that time period and beyond, thus is the probable IP address utilized by Kik user **1a2b77840** to access the Kik account to chat with Kik user USER 1 between the 19:13:19 UTC on 01/28/2023 and 00:11:21 UTC on 01/29/2023 (1:13:19 PM CST and 6:11:21 PM CST on Saturday 01/28/2023) and to receive CSAM file 4e706d43-e383-45a0-ae3f-e11f1454ba06 from Kik user USER 1 on 01/28/2023 at 19:16:48 UTC (1:16:48 PM CST). The IP address 24.72.179.176 was utilized on a recurring basis to access Kik account **1a2b77840** throughout the month of February 2023 and into March 2023.

On August 25, 2023, I applied for and obtained a search warrant from the Honorable U.S. Magistrate Judge Andrew M. Edison of the U.S. District Court, Southern District of Texas in Galveston, Texas, thereby authorizing the search of data and content of the Kik Messenger account associated with Kik username **1a2b77840** during the time period of January 15, 2023 through January 31, 2023 that is stored at premises controlled by Kik c/o MediaLab.AI, Inc. I served this search warrant upon MediaLab.AI, Inc. on August 26, 2023. I received the production for the account associated with Kik username **1a2b77840** from Kik c/o MediaLab.AI, Inc. Legal Support on August 28, 2023. This production contained 132KB of electronic data, to include subscriber information and chat logs. The data returned confirmed contact between Kik user USER 1 and Kik user **1a2b77840** during which Kik user 1a2b77840 received confirmed CSAM video file 4e706d43-e383-45a0-ae3f-e11f1454ba06 on 01-28-2023 at 19:16:48

Coordinated Universal Time (UTC) (1:16:48 PM Central Standard Time (CST)) but did not reveal any additional evidence of possession, receipt, or distribution of CSAM.

On October 7, 2023, I applied for and obtained a search warrant from the Honorable U.S. Magistrate Judge Andrew M. Edison of the U.S. District Court, Southern District of Texas, Galveston Division, thereby authorizing the search of the property and vehicles located at 122 Oyster Creek Drive, Angleton, Texas 77515 (hereinafter SUBJECT PREMISES).

On October 12, 2023, at approximately 5:30 AM, HSI Galveston Special Agents and other member agencies of the Houston Metro Internet Crimes Against Children (HMICAC) Task Force executed the search warrant at the SUBJECT PREMISES. Upon arrival at the SUBJECT PREMISES, agents discovered that **WATSON** and his registered vehicle were not present. I obtained **WATSON**'s cell phone number from his parents on scene and contacted him. I identified myself to **WATSON**, advised him that a federal search warrant is being executed at his residence, and requested that he return to his residence. **WATSON** stated that he would return to his residence. **WATSON** arrived at the residence in his registered vehicle at approximately 5:59 AM. As he was arriving at the SUBJECT PREMISES, agents stopped **WATSON** and asked him to step out of his vehicle, a white 2021 Ford F-150. I observed an Apple iPhone 15 Pro Max identified as belonging to **WATSON** in the center console and seized it for forensic analysis based upon probable cause that it contains evidence of criminal activity. The country of origin of the device is the People's Republic of China.

Pearland Police Department Detective Cecil Arnold and Special Agent DeWayne Lewis conducted a consensual interview of **WATSON** as the search of the SUBJECT PREMISES for evidence was being executed. **WATSON** was Mirandized by Detective Arnold in the presence of SA Lewis. **WATSON** waived his rights and agreed to speak to investigators without an attorney present.

WATSON admitted that he developed a curiosity for child pornography while viewing adult pornography. **WATSON** admitted that in January 2023, he began to receive and view child pornography while using the Snapchat social media application. **WATSON** stated that he then began accessing, receiving and viewing child pornography via the Whisper social media application and then moved on to accessing, receiving and viewing child pornography via several CLOUD SERVICE PROVIDER cloud storage accounts and a Kik Messenger user group. **WATSON** stated that the Kik account associated with Kik username **1a2b77840** is his account and that he was receiving child pornography files on that Kik account. **WATSON** admitted that while en route to his residence [SUBJECT PREMISES] at the request of agents, he became nervous and uninstalled several applications from his cell phone [SUBJECT DEVICE], to include his Kik social media application. **WATSON** stated that his Kik application had several previews of child pornography files within the application. **WATSON** identified two email accounts that are associated with CLOUD SERVICE PROVIDER accounts. **WATSON** offered to assist agents in accessing the SUBJECT DEVICE to reinstall the Kik application to show agents how he was receiving the child pornography links.

Agents showed a representative still image capture of the video file titled 4e706d43-e383-45a0-ae3f-e11f1454ba06 and **WATSON** stated that it appears like something that he has seen before while viewing child pornography.

Michael A. Monahan
Michael A. Monahan, Special Agent
U.S. Homeland Security Investigations

Submitted by reliable electronic means, sworn to, signature, attested telephonically per Fed. R. Crim. P. 4.1, and probable cause found on Oct 13, 2023



Andrew M. Edison
United States Magistrate Judge